

**REMARKS**

Claims 1-6, 8-10 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kallio (US Patent Publication US 2002/0147008 A1) in view of Bridgelall (US Publication 2002/0085516 A1).

Regarding claim 1, the Examiner states that Kallio teaches a method of managing mobility of a mobile station across an 802.xx wireless local area network (WLAN) and a wireless wide area network (WWAN) in which a mobile switching center (MSC) has been provisioned to act as a serving MSC for the WLAN comprising: a mobile station send handover access WWAN to the WLAN (page 6 section 0050); and the serving MSC for the WLAN causing the WWAN to recognize that the mobile station is registered with the serving MSC (WMC, 220) page 4 section 0031) for the WLAN and that the mobile station is no longer served by a prior MSC (112) (see figure 2, page 6 section 0050). Applicants respectfully disagree. Contrary to the Examiner's assertions, Kallio does not teach Applicants' claim 1 limitation of "in response to step (b), the serving MSC for the WLAN causing the WWAN to recognize that the mobile station is registered with the serving MSC for the WLAN and that the mobile station is no longer served by a prior MSC."

As stated in Applicants' February 8, 2005 response to the first Office Action dated September 8, 2004, the Examiner states that the serving MSC for the WLAN is the WMC shown in Kallio, Figure 2 and that the prior MSC is element 112 shown in Kallio, Figure 2. As an initial matter, element 112 in Kallio is the BTS in the GSM system, which is not an MSC. As commonly known in the art, a BTS (base transceiver station) merely transceives signals to and from a mobile station and does not perform the switching functions of an MSC. However, even if the BTS could be equated to an MSC, Kallio, page 6, section 0050 does not teach that the WMC causes the WWAN to recognize that the mobile station is registered with the WMC and no longer served by a prior MSC. Section 0050 teaches handover of a mobile station from a GSM system to a WLAN system wherein the GSM MSC 120, not the WLAN MSC 210, controls the handover process. In particular, the MSC 120 delivers a handover request to the WMC 210. The WMC 210 sends a handover request acknowledgement to the

MSC 120 and then the MSC 120 handles the handover procedure. The MSC 120 sends a handover command to the mobile station. The MSC 120 receives a handover message back from the mobile station. The MSC 120 releases the reserved resources from the GSM BSS 110. Kallio simply does not teach that the serving MSC for the WLAN causes the WWAN to recognize that the mobile station is registered with the serving MSC for the WLAN and no longer served by a prior MSC. Applicants request that the Examiner further explain how Kallio teaches this limitation.

On page 3 of the office action, the Examiner states "Kallio does not specifically mention in response to the mobile station issuing a registration request to the serving MSC (WMC) for the WLAN; and the mobile station detecting the RF energy of the WLAN and validating its ability to be a member of the WLAN." The Examiner cites Bridgelall, as teaching a method of a dual mode Radio, which enables a user to seamlessly switch between a WLAN and a WWAN or vice-versa while roaming in either network area, and a *mobile initiates communication via by issuing a registration request to the serving MSC for WLAN (page 4 section 038), in response to the mobile station issuing a registration request to the serving MSC for the WLAN (page 6 section 0050).* The Examiner's reference to Bridgelall's teachings (shown in italics above) is unclear, but it appears that the Examiner is stating that Bridgelall teaches Applicants' claim 1 step of "in response to step (a), the mobile station issuing a registration request to the serving MSC for the WLAN" on page 4 section 0038 and page 6 section 0050. Applicants assert that neither section 0038 nor section 0050 of Bridgelall teaches Applicants' step.

Page 4, section 0038, describes the GSM-Logical Channel Types shown in FIG. 3. Section 0038 states that the common control channels 322 perform call setup that can originate from the mobile. Section 0038 also states that a Random Access Channel 336 is used by the mobile station to request a dedicated channel from a network. These statements do not read on Applicants' step of "... the mobile station issuing a registration request to the serving MSC for the WLAN." Page 6, section 0050 describes a mobile station performing active scanning during a GSM multi frame, which likewise does not read on a

mobile station sending a registration request to the serving MSC for the WLAN.

The Examiner cites Bridgelall, Page 5, section 0044 as reading on Applicants' claim 1 limitation of "... the mobile station issuing a registration request to the serving MSC for the WLAN. Bridgelall describes a process for connecting a mobile station to an access point whereby the mobile station finds a network by passively listening for regularly scheduled beacons sent out by an AP or another mobile. The mobile station tunes to an 802.11(b) channel and listens for a beacon frame having a Service Set Identifier (SSID) with which the station wishes to join. After detecting the beacon, the mobile can begin negotiating a connection by proceeding with authentication and association process. Applicants do not understand how the Examiner is reading the aforementioned teachings of Bridgelall on claim 1. In Bridgelall, the mobile station does not send a registration message to an MSC (or access point) to register with the WLAN system.

The Examiner continues to assert that Kallio in combination with Bridgelall teaches Applicant's claim 6. On page 5 of the office action, the Examiner states that Kallio teaches the steps of: "the source MSC analyzing the message, establishing itself as an anchor MSC, and establishing communication channels with a target MSC servicing the detected WLAN" and "the target MSC relaying those communication [communication between the mobile station and WLAN] to the anchor MSC." The Examiner cites Kallio, page 6 section 0052 for these teachings. Applicants respectfully disagree.

Kallio does not teach a source MSC in a WWAN system establishing itself as an anchor MSC and the target MSC in a WLAN system relaying communications between the mobile station and the WLAN to the source MSC. Assuming for sake of argument that the WMC 210 is the MSC for the WLAN system (as the Examiner has assumed on page 2 of the office action) and that the MSC 120 is the MSC for the GSM system (as shown in FIG. 2 of Kallio), Kallio does not teach that the MSC 120 (source MSC) establishes itself as an anchor MSC and that after the mobile station establishes communications with the WLAN, the WMC 210 (target MSC) relays communications between the mobile station and the WLAN to the MSC 120, as recited in Applicants' claim 6.

Applicants request that the Examiner further explain how Kallio teaches these limitations. Applicants note that Bridgelall does not teach Applicants' claim 6 limitations of "the source MSC analyzing the message, establishing itself as an anchor MSC, and establishing communication channels with a target MSC servicing the detected WLAN" and "the target MSC relaying those communication to the anchor MSC. Thus, Applicants submit that neither Kallio, nor Bridgelall, separately or in combination, teach all limitations of claim 6.

In view of the foregoing remarks, Applicant submits that neither Kallio nor Bridgelall, separately or in combination, teach the limitations of claims 1 and 6. Claims 1 and 6 are therefore in condition for allowance. Applicant submits that claims 2-5 and 7-12 are allowable by virtue of their dependency on claim 1 (directly or indirectly). Applicant requests the reconsideration and reexamination of this application and the timely allowance of the pending claims. Please charge any fees associated herewith, including extension of time fees, to 50-2117.

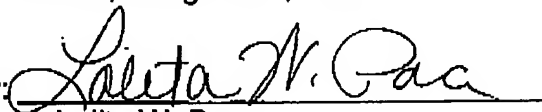
Respectfully submitted,  
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